

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Periodic Reporting  
(Proposal One)

Docket No. RM2018-4

PUBLIC REPRESENTATIVE MOTION  
FOR ISSUANCE OF INFORMATION REQUEST

(May 31, 2018)

Pursuant to 39 C.F.R. § 3001.21(a) and 39 C.F.R. § 3007.3(c), the Public Representative requests that an Information Request be issued to obtain additional clarifying data and information from the Postal Service concerning the proposed change to analytical methods pertaining its proposal to use of digital data from the Origin-Destination Information System – Revenue Pieces, and Weight System to estimate delivery point sequenced (DPS'd) mail destined for delivery by rural carriers to partially replace manual sampling of these volumes.<sup>1</sup> The proposed questions seek information that will allow participants to provide more constructive comments and evaluate whether the proposal meets applicable legal and regulatory requirements. Obtaining this information will also contribute to a better understanding of how the Postal Service has interpreted Commission rules and allow the Commission to make a fully informed and reasoned determination on whether Proposal One meets applicable legal and regulatory requirements, including 39 U.S.C. § 3652(e)(2) and 39 C.F.R. part 3050.

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<sup>1</sup> Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal One), May 17, 2018, (Petition).

### Proposed Questions

1. The following questions seek explanations related to the file entitled *Prop.1.RCCS\_Digital\_Impact.xlsx*.
  - a. Please confirm that the text in cells Q7 and Q8 states that the values in Column Q (Output Difference) are obtained by subtracting the values in Column O FY17 CS10 Output) from the values in Column P (Revised FY17 CS10 Output).
  - b. Please confirm the difference between Columns P and O for First Class Single Piece Letters should be 268, rather than -268.
  - c. If you do not confirm, please account for this discrepancy.
  - d. Please confirm that the formula for values in column Q does not subtract the values in Column O from Column P.
  - e. Please confirm that the values in Column S (Unit Output Difference w/PiggyBck) were calculated by dividing the values in Column R (Output Difference w/PiggyBck), by the values in Column U (USPS-FY17-32, CS06&7, Input DK, Column D).
  - f. If you confirm “e,” please refile *Prop.1.RCCS\_Digital\_Impact.xlsx*, using the formula suggested in “e.”
  - g. If you do not confirm “e,” please refile *Prop.1.RCCS\_Digital\_Impact.xlsx*, showing the formulas used to calculate the values in Column S.
  - h. If you confirm “e,” please explain why the unit output difference (with piggyback) in rural costs is calculated using RPW volumes, which include city and rural volumes, rather than RCCS’ delivered volumes.
2. Please refer to the file entitled *Prop.1.RCCS-Digital\_Documentation.pdf* at 3, which states that “[t]he total quarterly volume for the j<sup>th</sup> product is the sum of the quarterly volume of the digitally collected mailpieces and the quarterly volume of the manually sampled mailpieces.”
  - a. Please confirm that the estimated quarterly volume by compensation domain category and product domain category from the digital sample is calculated by expanding sampled ZIP-day volumes to ZIP-Quarter volumes which have been summed by ZIP Code.
  - b. If you do not confirm, please explain.
  - c. Please confirm that the estimated quarterly volume by compensation domain category and product domain category for the manual sample is calculated by expanding sampled Route-day volumes to Route-Quarter volumes which have been summed by stratum.
  - d. If you do not confirm, please explain.

- e. Please name and describe each fields that will be included in the Z file, referenced at 5.
- 3. Please refer to the file entitled *ChIR.1.Q.5.Attach.xlsx*, tab entitled *FY15PQ1*, which was filed in Docket No. RM2016-1, November 11, 2015, as part of the Response Of The United States Postal Service To Chairman's Information Request No. 1, Question 5. Please reproduce this tab using FY18 Q1 data for:
  - a. First Class Single-Piece Letters
  - b. First Class Presort Letters
  - c. Marketing/Standard Mail Letters and Total
  - d. Domestic Competitive Mail and Services.

Respectfully submitted,

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